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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FCC MAIL ROOM

In the Matter of)
)
Amendment of the Commission)
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)

CC Docket No. 95-115

DOCKET FILE COPY ORIGINAL

COMMENTS

Mid-Rivers Telephone Cooperative, Inc.
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September 25, 1995

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COMMENTS

Mid-Rivers Telephone Cooperative, Inc. (MRTC), Circle,
Montana, files these comments in response to the
Commissions July 20, 1995 Notice of Proposed Rulemaking in
the above captioned matter. The Commission requests
comments on specific proposals to increase
subscribership. These proposals include emphasis on
increasing connections and reconnections to and reducing
disconnection from the public switched network.

The Commission in its opening comments in this Docket
recognizes the success of its present Universal Service
policies in increasing subscriber penetration levels over

a long period of time. This is surprising, in that, in a companion Docket No. 80-286, the Commission appears to be intent on dismantling the present Universal Service policy. The Commission could be creating a situation where it will require that every attempt be made to keep a subscriber who does not pay bills on the network, but deny access to the network to those who would pay their bills if service was available.

All of the present Universal Service mechanisms, the Universal Service Fund (USF) and Lifeline Assistance Programs (Link up and SLC waiver), have been very effective in increasing subscriber levels. These programs must remain in place if present subscribership levels are to remain constant or increase in the future. These programs are the key to subscriber penetration. Reconnection and disconnection programs are incidental to the programs listed above.

Mid-Rivers will respond in general terms to the problems of connection and retention of subscribers. Mid-Rivers recognizes the problem of building facilities for customers who are then disconnected because of failure to pay bills for whatever the reason. Most of these subscribers once disconnected never reconnect and returns on facilities are diminished. Mid-Rivers, as most small local exchange carriers, already works with subscribers to

provide methods of initial connection to the network and opportunities to enable the subscriber to stay connected to the network. These include:

1. Providing Lifeline and Link-Up services,
2. Reasonable connection fees (\$25.00),
3. Reasonable deposit fees and the opportunity for third party commitment to pay in lieu of a deposit,
4. No aid to construction payment,
5. BETRS services.
6. Toll restriction available at \$3.00 per month,
7. Arrangement of payment schedules for subscribers having difficulty meeting payments,
8. Optional calling plans,
9. Education with regard to how to reduce toll charges, e.g. subscribe to optional calling plans or call at night or evening,
10. Prepaid debit cards, and
11. Equal access,

As the Commission can ascertain from the above list, many of its suggestions are already in place either due to state regulatory policy or as a voluntary practice of the local exchange carrier.

The Commission is correct in stating that most forced disconnects result from failure to pay toll bills - both inter and intrastate. The above listed programs are methods by which the telco can assist in keeping bills to a reasonable level. However, the individual subscribers must take some responsibility for monitoring their own toll usage and for ultimate payment of their bill. The local exchange telco normally has billing and collection contracts with interexchange carriers which mandate collection and disconnection procedures. Also, state and local tariffs and regulations may dictate policies and procedures in this regard.

The Commission will be best served by concentrating on broad Universal Service policies which have worked to provide facilities for subscribers requesting service and by continuing to let the regulation of payment for those services reside with state and local entities.

Respectively submitted this 25th day of September, 1995.

A handwritten signature in cursive script, reading "Gerry Anderson", is written over a horizontal line.

Gerry Anderson
General Manager